

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
NORTHERN DIVISION**

UNITED STATES OF AMERICA

v. * Criminal No.: GLR 21-444

MICHAEL MCDONALD

Defendant

**MOITION FOR LEAVE TO FILE ADDITIONAL MOTIONS UPON
COMPLETION OF DISCOVERY OR IN THE ALTERNATIVE TO PRECLUDE
THE INTRODUCTION OF EVIDENCE DISCLOSED AFTER THE DUE DATE**

Michael McDonald, Defendant, by and through counsel, Julie M. Reamy, respectfully moves this Honorable Court pursuant to Rule 45(b) of the Federal Rules of Criminal Procedure, to enlarge the time by which to file additional motions that may come to light upon completion of the discovery process or, in the alternative, to preclude the Government from introducing evidence at trial that would have been the subject of pre-trial motions, but for the fact of it not being provided prior to the court imposed deadline for producing discovery.

1. Some discovery materials have been provided to the Defendant; however, it is possible that the government may provide additional discovery at a later date, beyond the current motions filing date.

2. In the event that such circumstances materialize, the Defendant requests the aforementioned relief.

WHEREFORE, Defendant respectfully requests that his motion be granted.

Respectfully submitted,

_____/s/_____

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 16th day of March 2022, a copy of the foregoing *Motion for Leave to File Additional Motions Upon Completion of Discovery* was filed electronically in the United States District Court for the District of Maryland, was served electronically through the Clerk of the United States District Court using CM/ECF, upon Assistant United States Attorney, Kathleen Gavin.

_____/s/_____
Julie M. Reamy